



Registration form for interested parties and contributors

Case No.: AD0091

Anti-dumping investigation

Linear Low Density Polyethylene (LLDPE) originating from the United States of America (US)

Completed on behalf of (provide the name of your company):	ProAmpac Holdings Inc.
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(to note, we use the term “company” to include all forms of business organisation including partnerships and sole traders)

Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

When you have completed each form, indicate the **confidentiality** status of the document by placing an ☐ in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- ☐ Confidential
☒ Non-confidential (will be made available on the [public file](#).)

Deadline for response:	16 July 2026
Case team contact:	AD0091@traderemedies.gov.uk



Introduction

Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or a domestic importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or company who is not an interested party but who wants to register so that they can participate in an investigation.

Scope of the investigation

Goods concerned	Linear Low-Density Polyethylene (LLDPE)
Period of investigation (POI)	1 January 2025 to 31 December 2025
Injury Period	1 January 2022 to 31 December 2025
Country goods originating from	United States of America (US)

For further details, please refer to the *Notice of Initiation* on the public file: [Trade Remedies Authority](#).

Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by **16 July 2026** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).



We would like to make you aware that if the information we have requested is not supplied within a reasonable time, the TRA will be free to make determinations on the basis of the facts available.

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: [Trade Remedies Authority](#).

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#)¹ for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and will not be disclosed (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation, or a UK producer of goods that are like the goods subject to the investigation, or another interested party (other than the Government of the US) or a contributor, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your company is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your company may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your company than if it had cooperated.

If we decide to sample overseas exporters, and your company is not selected for this sample, you may submit a request to us to calculate individual margins for your company. We will accept your request providing that:

- you submit the required information on time; and

¹ <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation.

If information is not supplied within a reasonable time, the TRA may make determinations on the basis of the facts available.

Section A: About your company

A1. Your company's activities

1. To determine your company's role for the purpose of this investigation, please select the most applicable option for your company. Please refer to the period of investigation (POI) defined on page 2.

Overseas producers and exporters

- ☐ [A1.1] During the POI, we both produced and directly/indirectly exported the goods concerned from the US to the UK.
Note: Please complete sections A2, A3, and B.
- ☐ [A1.2] During the POI, we produced the goods concerned in the US, but did not export to the UK.
Note: Please complete sections A2 and B.
- ☐ [A1.3] During the POI, we directly/indirectly exported the goods concerned from the US to the UK, but did not produce the goods concerned.
Note: Please complete sections A3 and B.

UK producers and importers

- ☐ [A1.4] During the POI, we produced goods that are like the goods concerned in the UK and imported the goods concerned originating from the US to the UK.
Note: Please complete sections A4, A5, and B.
- ☐ [A1.5] During the POI, we produced goods that are like the goods concerned in the UK (i.e. the UK like goods), but we did not import the goods concerned from the US, but imported like goods from another country.
Note: Please complete sections A4, A5 and B.
- ☒ [A1.6] During the POI, we imported the goods concerned originating in the US to the UK, but we did not produce the goods that are like the goods concerned (the UK like goods).
Note: Please complete sections A5 and B.

Other

- ☐ [A1.7] Other.



Note: Please complete section B.

2. If you selected 'Other' [A1.7], please describe the activity/activities of your company and your company's interest in this investigation in the field below.

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3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.

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A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in the US**.

4. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description.

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5. Please provide your company's total production volumes and production capacity for the goods concerned (LLDPE) during the period of investigation (POI) in the table below.

Total production volume (POI) mt	
Total production capacity (POI) mt	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

6. Please provide details of how your production volume and capacity (for LLDPE) has changed over the injury period:



	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023
Total production volume mt			
Total production capacity mt			

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

7. Please provide details of finished stock of the goods concerned (LLDPE)

	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023
Total finished stock volume mt				

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#)

8. Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company name	Company location (city, country)	Activities	Relationship	Contact details (if available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

9. If you do not export the goods concerned to the UK either directly or via associated parties, please describe how your products are exported to the UK (e.g. via unrelated wholesalers).

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10. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your company during the POI in the table below.



Total domestic sales volume (POI) mt	
Total domestic sales value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

11. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

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12. Is your company, or any of your associated parties, related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods concerned (the UK like goods)?

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13. Please provide any details of other goods you produce and/or sell for the UK market, other than the goods concerned.

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A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from the US**.

14. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)	Contact details (if available)



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Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

15. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your company), which is located in the US or a third country, are to be considered indirect exports. If you are unable to determine the types of LLDPE, please provide the total volumes and indicate estimated proportions of each LLDPE.

	C4 LLDPE	C6 LLDPE	C8 LLPDE	Total LLDPE
Total direct export volume (POI) mt				
Total indirect export volume (POI) mt				
Total direct export value (POI) (£)				
Total indirect export value (POI) (£)				

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

16. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship	Contact details (if available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).



17. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below. For each commodity code listed please provide detail/ a brief description of the good shipped under that code, including if it is C4, C6, C8 or another type of LLDPE.

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A4. Production and sales of goods produced in the UK that are like the goods concerned

Complete this section if you indicated under **A1** that **you are a producer in the United Kingdom of goods that are like the goods concerned** (the UK like goods).

18. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned (the UK like goods).

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19. Please provide your company's total production volumes and production capacity for UK production of goods that are like the goods concerned (the UK like goods) during the POI in the table below. If possible, please split these by specific types of LLDPE e.g. C4, C6 and C8.

Total production volume (POI) mt	
Total production capacity (POI) mt	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

20. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned (the UK like goods) produced by your company in the UK during the POI in the table below. If possible, please split these by specific types of LLDPE e.g. C4, C6 and C8.



Total domestic sales volume (POI) mt	
Total domestic sales value (POI) (£)	
Total export sales volume (POI) mt	
Total export sales value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

21. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods that are like the goods concerned (the UK like goods)? If yes, please provide details of these fluctuations.

22. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods concerned (the UK like goods)?

A5. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the US**.

23. Please provide the total of your import volumes and import values of the goods concerned originating from the US to the UK during the POI in the table below.

	C4 LLDPE	C6 LLDPE	C8 LLPDE	Total LLDPE
Total import volume (POI) mt	[900-1140]	[1,900-2,210]		[2,800 – 3,350]
Total import value (POI) (£)	[675,000-825,000]	[1,850,000-2,300,000]		[2,525,000-3,125,000]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).



24. Please provide the total of your import volumes and import values of the goods concerned from you three largest destinations by volume to the UK during the POI in the table below.

Country 1	Country name: [redacted – commercially sensitive information]
Total import volume (POI) mt	[2,800 – 3,350]
Total import value (POI) (£)	[2,525,000-3,125,000]
Country 2	Country name: [redacted – commercially sensitive information]
Total import volume (POI) mt	[3,500-4,500]
Total import value (POI) (£)	[3,100,000-3,900,000]
Country 3	Country name: [redacted – commercially sensitive information]
Total import volume (POI) mt	[1,500-2,000]
Total import value (POI) (£)	[1,650,000- 2,050,000]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

25. Please provide details for your suppliers of the goods concerned originating from US in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship	Contact details (if available)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

26. Please specify your purpose in importing the goods concerned from the US. Select all of the following options that are applicable to your company.

- ☐ We resell the goods unchanged to distributors or final customers.
- ☐ We process the goods before reselling them to distributors or final customers.



- ☐ We use the goods as input in our production of _____.
(specify the product/s).
- ☐ We re-export the good to third countries, namely _____
- ☒ Other.

27. If you selected "other", please specify your purpose for importing the goods concerned to review from the US in the field below.

The goods concerned are used for the manufacture and supply of polyethylene products to the packaging industry.

28. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

Polyethylene produced in the UK and the USA is not materially different in chemical terms, as both are produced from ethylene using broadly similar polymerisation processes. The main differences arise from the production methods, regulatory environment and supply chain context. US producers typically benefit from access to low-cost ethane derived from shale gas. UK and wider European production is generally more exposed to higher energy costs and feedstocks linked to oil-based naphtha, while also operating within a different regulatory and sustainability frameworks.

Section B: Additional information

B1. Other known companies

We need contact information in order to notify all other known companies who may be interested in taking part in the investigation and making their views known.

B1.1 Exporters, importers, and UK producers

29. Please provide contact details of any other known exporters and importers of the goods concerned and UK producers of the goods that are like the goods concerned (the UK like goods) in the table below.

Activities (exporter / importer / UK producer)	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)



Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

B1.2 Upstream and downstream companies

30. Please provide contact details for UK companies from whom you purchase materials used to make the like goods (upstream companies) and UK companies who purchase the like goods from you (downstream companies) to help us obtain a more complete picture of the potential effects of a measure.

You are not obligated to provide this information but we will use any details you provide to get in touch with these companies and improve our understanding of the impacts of any potential measure.

Activities (upstream / downstream)	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

B1.3 Any other companies

31. Please provide a list of any other known companies, including the nature of their company and any associations with other companies.

This may include, for example, companies that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries.

Information on upstream and downstream companies to follow.

B2. Scope

32. If you consider that the description of the goods concerned for the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.



The description of the goods concerned is overly broad. There is insufficient distinction between LLDPE and MLLDPE (metallocene).

The UK plant production is heavily focused on the production of mLLDPE (metallocene) grade of C6 Hexene. There is an insignificant UK industry for the production of LLDPE C6 (non-metallocene) or LLDPE C4 (Butene). The description of the goods and the scope of the investigation should be narrowed accordingly.

33. Please provide any further remarks relating to the goods concerned and the goods that are like the goods concerned (the UK like goods). Areas may include, for example: the interchangeability of different types and brands of LLDPE (e.g. C4, C6 and C8).

The primary distinguishing factor for selecting the goods concerned is the number of comonomers, i.e. grade of LLDPE and the catalyst used.

B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the US.

We have created the following draft PCN table:

TYPE	CODE	DESCRIPTION
Type of polyethylene	P	Low Density Polyethylene (LDPE) (Out of scope)
	H	High Density Polyethylene (HDPE) and Ultra High Density Polyethylene (UHDPE) (Out of scope)
	L	Linear Low Density Polyethylene (LLDPE)
Number of co-monomers	C4	4 - Butene
	C6	6 – Hexene



	C8	8 – Octene
Catalyst	Zn	Ziegler-Nata catalysts
	Me	Metallocene catalysts
	Ot	Other
Production method	G	Gas Phase process
	L	Liquid Phase process
	S	Slurry Loop Phase process

34. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your company.

There should be a distinction between mLLDPE and LLDPE.

35. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the goods that are like the goods concerned (the UK like goods).

36. If you are an overseas exporter or importer of the goods concerned or a UK producer of the goods that are like the goods concerned (the UK like goods), comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on:

- the categorisation of product features;
- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs;
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or the goods that are like the goods concerned (the UK like goods) which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”; and



- do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

37. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or the goods that are like the goods concerned (the UK like goods).

The United States of America is a prominent producing region of these polymer types. The United States of America obtain ethylene through the use of natural gas, including shale gas. In Europe, crude oil is a source of feedstock which is used to create polyethylene. Feedstock is a publicly available commodity and the prices are controlled globally. Energy costs are also a significant part of the production costs and vary between regions.

B4. Other comments

38. Please use the field below to provide additional information that you consider relevant to this investigation.

There is significant investment in the UK by importers of Polyethylene, UK importers play an important role in supporting the wider UK economy. Polyethylene has a wide range of applications in manufacturing within the UK which supports jobs, not only within the manufacturing business itself but also across logistics, warehousing, transport, customs, packaging, professional services, and retail. Manufacturing in the UK which consumes Polyethylene uses domestic service providers and local supply chains as well as providing employment in the UK directly and indirectly and supplies to UK customers.

This submission is made on behalf of ProAmpac Holdings Inc. who are responsible for imports within the group including ProAmpac Security Products Ltd and ProAmpac Elsham Public Limited Company.



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Authority

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Registration form and
Pre-sampling questionnaire

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